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Attorneys for Defendants

Addus HealthCare, Inc. and

Addus HomeCare Corporation

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

MARY MOORE, individually, and on
behalf of other members of the
general public similarly situated;

Plaintiff,

vs.

ADDUS HEALTHCARE, INC., an
unknown business entity; ADDUS
HEMECARE, INC., an unknown
business entity; and DOES 1 through
100, inclusive,

Defendants.

Case No. 4:19-CV-01519-HSG

[Assigned to Hon. Haywood S. Gilliam, Jr.]

CLASS ACTION

**JOINT STIPULATION AND ~~[PROPOSED]~~
ORDER REGARDING BRIEFING
SCHEDULE AND HEARING DATE ON
PLAINTIFF'S MOTION FOR CLASS
CERTIFICATION, AND NON-EXPERT
DISCOVERY CUT-OFF**

Date Action Filed:

July 11, 2017

First Am. Complaint Filed:

March 21, 2019

Date Removal Filed:

March 22, 2019

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8. WHEREAS, on March 19, 2020, Governor Newsom issued a stay at home order to slow the spread of COVID-19, which ordered all individuals living in California to stay at home;

1 9. WHEREAS, the parties agree that an in-person deposition is not feasible at
2 this time, and Plaintiff's counsel does not believe that a remote deposition would allow
3 them to properly prepare for and conduct the deposition. Further, Plaintiff works in the
4 healthcare industry, which presents further challenges to scheduling her deposition at
5 this time;

6 10. WHEREAS, Defendants will need Plaintiff's deposition in order to
7 properly respond to the motion for class certification;

8 11. WHEREAS, in light of current circumstances surrounding COVID-19 and
9 their impact on Defendants' ability to take Plaintiff's deposition at this time, the parties
10 request a six-week extension of Defendants' time to file their opposition to Plaintiff's
11 motion for class certification, for Plaintiff's to file her reply, and the hearing date for
12 Plaintiff's motion, to May 28, 2020, June 18, 2020, and July 2, 2020 (or as soon
13 thereafter as the Court's calendar permits), respectively;

14 12. WHEREAS, should the Court continue the deadline for Defendants'
15 opposition to Plaintiff's motion for class certification from April 16, 2020 to May 28,
16 2020, the parties also request a six-week extension of the non-expert discovery cut-off,
17 from May 14, 2020 to June 25, 2020. This extension is necessary to permit Plaintiff the
18 opportunity to take the depositions of any witnesses who have submitted declarations in
19 support of Defendants' opposition to Plaintiff's motion for class certification, or any
20 other discovery necessary to prepare Plaintiff's reply brief. If this Court were to
21 continue Defendants' opposition deadline to May 28 but not continue the May 14 non-
22 expert discovery cut-off, Plaintiff would not have the opportunity to review Defendants'
23 opposition and determine what additional discovery is needed to prepare her reply brief;

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1 13. WHEREAS, if circumstances have not changed after six weeks, the parties
2 will re-evaluate whether a further continuance should be requested;

3 14. WHEREAS, this stipulation is made for good cause and not for the purpose
4 of delay.

5 **IT IS SO STIPULATED.**

6
7 Dated: March 25, 2020

**AKIN GUMP STRAUSS HAUER &
FELD LLP**

8
9 By /s/ Gary M. McLaughlin
10 Gary M. McLaughlin**
11 Attorneys for Defendants
12 Addus HealthCare, Inc. and
Addus HomeCare Corporation

13 Dated: March 25, 2020

**MARLIN & SALTZMAN, PC
LAWYERS *for* JUSTICE, PC**

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16 By /s/ Tatiana Avakian
17 Tatiana Avakian
18 Attorneys for Plaintiff
Mary Moore

19 **Pursuant to L.R. 5-1(i)(3), I attest that concurrence in the filing of this document
20 has been obtained from each of the other signatories.

1 **~~PROPOSED~~ ORDER**

2 **IT IS HEREBY ORDERED**, good cause appearing, that:

3 1. The deadline for Defendants' opposition to Plaintiff's motion for class
4 certification is hereby continued six (6) weeks and is to be filed by May 28, 2020.

5 2. The deadline for Plaintiff's reply to Defendants' opposition to Plaintiff's
6 motion for class certification is hereby continued six (6) weeks and is to be filed by June
7 18, 2020.

8 3. The hearing date for Plaintiff's motion for class certification is hereby
9 continued from May 21, 2020 to July 2, 2020 at 2:000 p.m.

10 4. The non-expert discovery cut-off is hereby continued from May 14, 2020
11 to June 25, 2020.

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14 Dated: 3/26/2020

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16 The Honorable Haywood S. Gilliam, Jr.
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